

EXHIBIT 16

From: [Christopher Furman](#)
To: [Heather Derenski](#)
Cc: [James Hicks](#); [Kaily Watson](#)
Subject: RE: Wright v. SF | Discovery verification
Date: Monday, February 5, 2024 1:46:09 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)

Hi Heather,


I apologize for not getting you topic redlines last night as I had promised. Do you have time for a short call today? Maybe 5pm? We have some news. Let me know what works best for you.




Thanks,








Christopher W. Furman

Associate Attorney

 [2815 Elliott Avenue • Suite 100 • Seattle, Washington 98121](#)

 [\(206\) 767-9780](#)  [\(312\) 767-9780](#)  [SinarsLaw.com](#)

 [\(312\) 767-9790 • Chicago, IL](#)  [\(618\) 215-6780 • Edwardsville, IL](#)
 [\(314\) 391-2260 • St. Louis, MO](#)  [\(206\) 705-2115 • Seattle, WA](#)
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From: Heather Derenski <Heather@cedarviewlaw.com>

Sent: Sunday, February 4, 2024 5:04 PM

To: Christopher Furman <cfurman@sinarslaw.com>

Cc: James Hicks <jhicks@sinarslaw.com>; Kaily Watson <Kaily@cedarviewlaw.com>

Subject: RE: Wright v. SF | Discovery verification

Christopher,

Attached is the proposed protective order with my edits, per our discussion last Friday. The list of documents has been revised based on 1) documents previously produced that you have indicated do not have a newer version that is applicable to Mr. Treat's handling and 2) that are not relevant to the Wrights' claim (e.g. SFPSP guides) and 3) documents we previously requested that are referenced in applicable Operations Guides.

I have also included the HIPAA language based on the protected information discussed during the Wrights' depositions, as noted by my objections to that information, and as discussed with Mr. Hicks during those depositions.

Heather

Heather Derenski | Attorney
CEDAR VIEW LAW, PLLC

Office: (425) 460-0080 | www.cedarviewlaw.com

Direct: (425) 818-4802 | 108 Union Avenue Snohomish, WA 98290

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From: Christopher Furman <cfurman@sinarlaw.com>

Sent: Wednesday, January 24, 2024 2:03 PM

To: Heather Derenski <Heather@cedarviewlaw.com>

Cc: James Hicks <jhicks@sinarlaw.com>

Subject: RE: Wright v. SF | Discovery verification

Hi Heather,

Please see attached proposed stipulated protective order following our discovery conference. Let us know if you approve.

Regards,



Christopher W. Furman

From: [Heather Derenski](#)
To: [Christopher Furman](#)
Subject: Wright v. State Farm, Exhibit A to FRCP 30(b)(6)
Date: Friday, February 2, 2024 7:52:16 PM
Attachments: [EXHIBIT A.docx](#)

Christopher,

Attached is Exhibit A to the FRCP 30(b)(6) Deposition Notice to State Farm.

Heather

Heather Derenski | Attorney

CEDAR VIEW LAW, PLLC

Office: (425) 460-0080 | www.cedarviewlaw.com

Direct: (425) 818-4802 | 108 Union Avenue Snohomish, WA 98290

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From: [Christopher Furman](#)
To: [Heather Derenski](#)
Cc: [Kaily Watson](#); [James Hicks](#); [Wendy Morrow](#); [Laura McKeon](#)
Subject: RE: Wright v. State Farm Fire and Casualty Company, FRCP 30(b)(6) call
Date: Friday, February 2, 2024 5:56:29 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)

Hi Heather,

Thanks for the call just now regarding the stipulated PO, 30(b)(6) topics, and continuance motion. This is to confirm that we would stipulate to State Farm's 30(b)(6) deposition taking place within 30 days after the current discovery cutoff of February 23, 2024, on a mutually agreed upon date, conditioned on continued good-faith negotiation of the 30(b)(6) topics and mutual scheduling concerns, with the further caveat that the deposition will be renoted if the trial is continued. We look forward to receiving your redlines to the proposed stipulated protective order and will send you redlines on the topics to review this weekend.

If you are available, please feel free to give me a call on Sunday once we have exchanged redlines so that we can iron out any remaining differences.


Have a good weekend,




Christopher W. Furman


Associate Attorney


 [2815 Elliott Avenue • Suite 100 • Seattle, Washington 98121](#)


 [\(206\) 767-9780](#)


 [\(312\) 767-9780](#)


 [SinarsLaw.com](#)

 [\(312\) 767-9790 • Chicago, IL](#)

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From: Heather Derenski <Heather@cedarviewlaw.com>

Sent: Monday, January 29, 2024 5:07 PM

To: Christopher Furman <cfurman@sinarlaw.com>; James Hicks <jhicks@sinarlaw.com>; Wendy Morrow <wmorrow@sinarlaw.com>; Laura McKeon <lmckeon@sinarlaw.com>

Cc: Kaily Watson <Kaily@cedarviewlaw.com>

Subject: Wright v. State Farm Fire and Casualty Company, FRCP 30(b)(6) call

Christopher,

I just left you a message regarding our Fed. R. Civ. P. 30(b)(6) conference scheduled for 5pm this evening. Please advise your availability to accomplish this call.

Heather

Heather Derenski | Attorney
CEDAR VIEW LAW, PLLC

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Direct: (425) 818-4802 | 108 Union Avenue Snohomish, WA 98290

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